

DMP:CRH/JMH/EHS  
F. #2021R00412

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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UNITED STATES OF AMERICA

I N F O R M A T I O N

- against -

Cr. No. 21cr313 (PKC)  
(T. 18, U.S.C., §§ 371 and 3551 et seq.)

HONGRU JIN,

Defendant.

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THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(Conspiracy to Act as an Agent of a Foreign Government  
Without Prior Notification to the Attorney General)

1. In or about and between September 2016 and November 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant HONGRU JIN, together with others, did knowingly and willfully conspire to act in the United States as an agent of a foreign government, to wit: the People's Republic of China ("PRC"), without prior notification to the Attorney General of the United States, as required by law, contrary to Title 18, United States Code, Section 951(a).

2. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant HONGRU JIN, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about April 1, 2017, a co-conspirator (Co-Conspirator-1) asked JIN, in sum and substance, to work with him, on behalf of the PRC government, in a secret scheme to locate, surveil and attempt to repatriate to the PRC John Doe #1 and Jane Doe #1, individuals who resided in New Jersey and whose identities are known to the United States Attorney.

(b) On or about April 1, 2017, at the direction of Co-Conspirator-1, JIN purchased SIM cards for cell phones.

(c) On or about April 3, 2017, at the direction of Co-Conspirator-1, JIN picked up two other co-conspirators at Newark Liberty International Airport in Newark, New Jersey.

(d) On or about and between April 3, 2017 and April 4, 2017, JIN met with Co-Conspirator-1 and a second co-conspirator, whom JIN knew to be a PRC government official, and planned surveillance of John Doe #1, Jane Doe #1 and their family members.

(e) On or about April 5, 2017, JIN and two co-conspirators rented a car from a rental car facility in Newark, New Jersey.

(f) On or about April 5, 2017, JIN conducted surveillance, at the direction of members of the PRC government, of a residence in New Jersey belonging to a relative of John Doe #1.

(Title 18, United States Code, Sections 371 and 3551 et seq.)

COUNT TWO  
(Conspiracy to Engage in Interstate Stalking)

3. In or about and between September 2016 and November 2019, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant HONGRU JIN, together with others, did knowingly and willfully conspire to travel in interstate and foreign commerce, to wit: (i) from the PRC to New Jersey, and from New York to New Jersey, with the intent to harass and intimidate John Doe #1, and (ii) from the PRC to California, with the intent to harass and intimidate Jane Doe #2, an individual who is the adult daughter of John Doe #1 and whose identity is known to the United States Attorney, and in the course of and as a result of such travel, engage in conduct that caused, attempted to cause and was reasonably expected to cause John Doe #1 and Jane Doe #2 substantial emotional distress, contrary to Title 18, United States Code, Section 2261A(1)(B).

4. In furtherance of the conspiracy and to effect its objects, within the Eastern District of New York and elsewhere, the defendant HONGRU JIN, together with others, did commit and cause the commission of, among others, the following:

OVERT ACTS

(a) On or about and between April 3, 2017 and April 5, 2017, several co-conspirators traveled to the United States from the PRC with John Doe #1's father.

(b) On or about April 5, 2017, several co-conspirators brought John Doe #1's father to a residence in New Jersey belonging to a relative of John Doe #1, and

directed John Doe #1's father to attempt to compel John Doe #1 to travel to the PRC against his will.

(c) On or about April 5, 2017, JIN conducted surveillance of the residence in New Jersey belonging to a relative of John Doe #1.

(d) On or about May 22, 2017, a co-conspirator directed a private investigator to locate and conduct surveillance of Jane Doe #2.

(e) In or about and between April 2018 and July 2018, a co-conspirator sent unsolicited and derogatory messages about Jane Doe #2 and Jane Doe #2's family members to associates of Jane Doe #2.

(f) On or about September 4, 2018, two co-conspirators traveled to John Doe #1's residence in New Jersey and left several handwritten notes that contained threatening messages demanding that John Doe #1 return to the PRC.

(Title 18, United States Code, Sections 371 and 3551 et seq.)



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MARK J. LESKO  
ACTING UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

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**INFORMATION**

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(T. 18, U.S.C., §§ 371 and 3551 et seq.)

*A true bill.*

\_\_\_\_\_  
*Foreperson*

*Filed in open court this* \_\_\_\_\_ *day,*

*of* \_\_\_\_\_ *A.D. 20* \_\_\_\_\_

\_\_\_\_\_  
*Clerk*

*Bail, \$* \_\_\_\_\_

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*Craig R. Heeren, J. Matthew Haggans, Ellen H. Sise,*  
*Assistant U.S. Attorneys (718) 254-7000*